

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

In re:	§	Chapter 11
	§	
UNIVERSAL REHEARSAL PARTNERS, LTD.	§	Case No. 22-31966
	§	
Debtor.	§	

**STIPULATION AND AGREED ORDER EXTENDING TIME TO RESPOND TO
LIQUIDATING TRUSTEE’S OBJECTIONS TO CLAIMS OF JOHN KIRTLAND
[CLAIM NO. 6] AND PAULA FIELD [CLAIM NO. 5]**

Erik White, in his capacity as the trustee (the “*Liquidating Trustee*”) of Universal Rehearsal Partners Liquidating Trust, successor to Universal Rehearsal Partners, Ltd. (the “*Debtor*”), and John Kirtland (“*Kirtland*”), submit this Stipulation and Agreed Order extending the time to respond to the Liquidating Trustee’s objections to the claims of Kirtland and Paula Field, C.P.A., C.F.E. (“*Field*”).

I. RECITALS

1. On January 8, 2023, Field filed a proof of claim in the amount of \$59,500.00 for audit and forensic accounting services performed. *See* Claim No. 5 (the “***Field Claim***”).

2. Kirtland filed a proof of claim on February 16, 2023 in the amount of \$1,415,299.86. *See* Claim No. 6 (the “***Kirtland Claim***”).

3. The Trustee filed his objections to both the Field and Kirtland Claims on May 29, 2023. *See* Dkt. Nos. 134 and 135. Field and Kirtland’s respective responses thereto are presently due on June 29, 2023. *See id.*

4. A hearing on the Trustee’s objections to the Field Claim, the Kirtland Claim and others is presently scheduled for July 18, 2023 at 2:00 p.m. *See* Dkt. No. 140.

5. The parties have conferred and have agreed to extend the deadline for filing responses to the Trustee’s objections to the Field Claim and the Kirtland Claim up to and including on or before the close of business on **Friday, July 7, 2023**.

6. This is the first such extension of time requested and is not sought for any improper purpose. Nor would the extension result in undue delay or prejudice to any interested party.

II. STIPULATION

The Parties hereby stipulate and agree as follows, and it is hereby ORDERED, that the deadline for Kirtland and Field to respond to the Liquidating Trustee’s objections to the Kirtland Claim and the Field Claim is extended through and including **Friday, July 7, 2023**.

END OF ORDER###

STIPULATED AND AGREED TO BY:

/s/ Kyle Woodard

John J. Kane (TX Bar No. 24066794)
Kyle Woodard (TX Bar No. 24102661)
JaKayla J. DaBera (TX Bar No. 24129114)
Kane Russell Coleman Logan PC
901 Main Street, Suite 5200
Dallas, Texas 75202
Telephone: (214) 777-4200
Telecopier: (214) 777-4299
E-mail: jkane@krd.com
E-mail: kwoodward@krd.com
E-mail: jdabera@krd.com

**COUNSEL FOR ERIK WHITE,
TRUSTEE OF THE LIQUIDATING
TRUST**

/s/ Jacob Sparks

Jacob Sparks (TX Bar No. 24066126)
Nelson Mullins Riley & Scarborough LLP
5830 Granite Parkway, Suite 1000
Plano, Texas 75024
Telephone: (469)484-4758
Facsimile: (469)828-7217
E-mail: jacob.sparks@nelsonmullins.com

COUNSEL FOR JOHN KIRTLAND